



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095
(603) 271-2900 FAX (603) 271-2456



May 21, 2004

CERTIFIED MAIL
7000 1670 0000 0585 8933
RETURN RECEIPT REQUESTED

LETTER OF DEFICIENCY
No. WMD 04-08

Omni Components Corporation
46 River Road
Hudson, New Hampshire 03051

Attn: Mr. David Holka, Vice President

Re: Omni Components Corporation
Hudson, New Hampshire
EPA ID # NHD500023148

Dear Mr. Holka:

On April 12, 2004, the Department of Environmental Services, Waste Management Division ("DES") conducted an inspection of Omni Components Corporation ("Omni"). The purpose of the inspection was to determine Omni's compliance status relative to RSA Ch. 147-A and the New Hampshire Hazardous Waste Rules, Env-Wm 100-1100.

As a result of the inspection and review of the information provided to DES, the following deficiencies were documented:

Env-Wm 509.02(a)(2) – Personnel Training

A review of Omni's personnel training program revealed the following deficiencies:

- (a) The Primary Emergency and Alternate Emergency Coordinator had not taken part in annual hazardous waste training and/or reviews for the years noted:
1. David Holka - 2002; and
 2. Kim Lainey - 2002, and 2003.

- (b) Omni personnel responsible for signing hazardous waste manifests had not received hazardous waste training for the years noted:
 - 1. Christie Caplin – 2002, and 2003; and
 - 2. Dan Badard - 2002, and 2003.
- (c) Omni's facility training records failed to document a training program which includes a list of hazardous waste job titles, job descriptions, descriptions of introductory and continuing training to be provided for each position, and names of employees filling each position.

Env-Wm 509.02(a)(2), which references 40 CFR 265.16, Personnel Training, requires full quantity generators to maintain a personnel training program. This includes, but is not limited to, ensuring that initial hazardous waste training and annual reviews are conducted for personnel handling hazardous waste. Env-Wm 509.02(a)(2) also requires full quantity generators to maintain at the facility, specific documents and records related to personnel training.

DES requested that Omni conduct and document hazardous waste training and annual updates for the Emergency Coordinators and employees responsible for signing hazardous waste manifests. DES also requested that Omni maintain, as part of the facility training program, documents of hazardous waste job titles, job descriptions, and names of employees filling each position and correct any deficiencies as identified in the enclosed Full Quantity Generator Module. Lastly, DES requested that Omni submit a copy of this personnel training program to DES.

In an April 21, 2004 fax submittal, Mr. David Holka, Vice President, provided a written personnel training program. The plan included a list of hazardous waste job titles, job descriptions, descriptions of introductory and continuing training to be provided for each position, and names of employees filling each position. The submittal also provided a list of employees that received hazardous waste training for the year 2004. No further action is required.

2 Env-Wm 509.02(a)(5) – Contingency Plan

At the time of the inspection, Omni's contingency plan was confirmed to be incomplete. Specific deficiencies are listed in the attached Contingency Plan Module.

Env-Wm 509.02(a)(5), which references 40 CFR 265, Subpart D, requires full quantity generators to maintain a complete contingency plan at the site.

DES requested that Omni revise and update its contingency plan to correct any deficiencies as identified in the enclosed Contingency Plan Module.

In the April 21, 2004 and May 12, 2004 submittals from Mr. David Holka, Vice President, documentation was provided to demonstrate that Omni's contingency plan was complete. No further action is required.

3 Env-Wm 807.06(b)(7) - Standards for Generators of Used Oil Being Recycled

At the time of inspection, DES confirmed that a complete used oil determination had not been conducted for Omni's "Used Coolant" and "Used Machine Oil."

Env-Wm 807.06(b)(7) requires generators to conduct an initial used oil determination by analyzing it for all of the parameters specified in Env-Wm 807.02 and Env-Wm 807.03 (exclusive of PCB's if no source of PCB's is present).

DES requests that Omni conduct initial used oil determinations for the parameters outlined in Env-Wm 807.02 and Env-Wm 807.03. These parameters include arsenic, cadmium, chromium, lead, flash point, and total halogens. DES also requests that Omni provide the results of the used oil determinations to DES.

4. Env-Wm 1102.03 and Env-Wm 1112.04 - Universal Waste Management

At the time of the inspection, the following containers of universal waste lamps were not marked with the words "Universal Waste – Lamps", "Waste Lamp(s)", or "Used Lamp(s)."

(a) Three (3) 8-foot boxes; and

(b) One (1) 4-foot box

Env-Wm 1112.04, which references Env-Wm 1102.03, requires universal waste handlers to ensure all container(s) holding universal waste lamps to be clearly labeled or marked with any of the following: "Universal Waste – Lamps", "Waste Lamp(s)", or "Used Lamp(s)."

DES requested that Omni clearly label or mark containers holding universal waste lamps with any of the following: "Universal Waste – Lamps", "Waste Lamp(s)", or "Used Lamp(s)."

In an April 19, 2004 e-mail submittal, Mr. David Holka, Vice President, provided documentation substantiating compliance with the universal waste labeling requirement. No further action is required.

5. Env-Wm 1102.03(c)(1) – Universal Waste Management

At the time of the inspection, the following containers of universal waste lamps were not closed:

- (a) Three (3) eight-foot boxes; and
- (b) One (1) four-foot box

Env-Wm 1102.03(c)(1) requires universal waste containers to be closed, except when universal waste is being added to or removed from the container.

DES requested that Omni ensure that containers of universal waste lamps are closed, except when universal waste is being added to or removed from the container.

In an April 19, 2004 e-mail submittal, Mr. David Holka, Vice President, provided documentation to substantiate compliance with the Universal Waste closed container requirement. No further action is required.

6. Env-Wm 1102.03(c) and Env-Wm 1112.03(a) - Universal Waste Container Requirements

At the time of inspection, seven (7) universal waste lamps were observed in the Universal Waste Storage Area without a container.

Env-Wm 1112.03(a) requires universal waste handlers to store intact and broken universal waste lamps in container(s) that meet the requirements of Env-Wm 1102.03(c). Env-Wm 1102.03(c) furthermore stipulates the containers must be closed, compatible with the universal waste and its contents, and free of defects, design characteristics or damage.

DES requested Omni to ensure all universal waste lamps generated at the facility are placed and stored in containers that meet the requirements of Env-Wm 1102.03(c).

In an April 19, 2004 e-mail submittal, Mr. David Holka, Vice President, provided documentation substantiating compliance with the universal waste container requirements. No further action is required.

DES believes the remaining cited deficiency (item #3) can be corrected and a report describing the corrective measures taken by Omni can be submitted within thirty (30) days of receipt of this letter. Supporting documentation that describes the measures taken to achieve compliance should be included with the report.

In the event compliance is not achieved within this period, DES may take further action against Omni, including issuing an order requiring that deficiencies be corrected, initiating an administrative fine proceeding, and/or referring the matter to the New Hampshire Department of Justice for imposition of civil penalties. In addition, DES personnel may reinspect your facility at a later date to determine whether the facility has come into, and is maintaining, full compliance with the applicable rules. Fines may be pursued for any or all violations observed during this or subsequent inspections of the facility.

The written report as requested above should be addressed as follows:

Kenneth W. Marschner, Administrator
DES/WMD
P.O. Box 95
Concord, New Hampshire 03302-0095

Enclosed you will find a copy of the completed Hazardous Waste Generator Inspection Report which documents the compliance status of your facility at the time of the inspection. This checklist may also be of value to you for use in determining future compliance with the New Hampshire Hazardous Waste Rules.


The State of New Hampshire Hazardous Waste Rules, as well as much other useful information, can be obtained from DES's website at <http://www.des.state.nh.us/hwcs/>, or by contacting the Public Information Center at (603) 271-2975.

It is the goal of DES to promote the prevention of pollution at the source as the preferred option for meeting established environmental quality goals. We strive to ensure that pollution prevention options are considered first, followed by recycling, treatment and disposal. I am requesting that the DES's Pollution Prevention Coordinator, Stephanie D'Agostino, contact you to discuss possibilities for waste minimization or source reduction at your facility. In the meantime, if you have immediate questions about pollution prevention, please feel free to contact her at 271-6398.

As a service to New Hampshire's hazardous waste generators, we maintain a Hazardous Waste Assistance Hotline which is available for you to contact our knowledgeable staff of hazardous waste inspectors. Our hazardous waste staff are available to answer your questions concerning the New Hampshire Hazardous Waste Rules and the compliance issues which affect your hazardous waste management program. The technical assistance available through the Hotline includes fact sheets that pertain to the management and recycling of specific wastes, summary sheets of specific sections of the Hazardous Waste Rules, copies of EPA and New Hampshire hazardous waste policy or regulatory interpretation letters that may benefit your operation, and networks with other state or federal agencies to answer your questions on a national level. The Hotline is available Monday through Friday, 8:00 AM to 4:00 PM at 271-2942 or toll free at (1-866) HAZ-WAST (in-state only).

Should you have any questions regarding this letter, please contact the lead inspector, Eric K. Abrams or John J. Duclos, Supervisor of the Hazardous Waste Compliance Section at 271-2942. Specific questions regarding water related issues may be directed to Mary Jane Meier of DES's Water Division at 271-5553, and for air related issues, please contact Pam Monroe of DES's Air Resources Division at 271-1370. Thank you for your cooperation.

Sincerely,


Kenneth W. Marschner, Administrator
Waste Management Programs
Waste Management Division

cc: DB/RCRA/NOPV/Archives
Anthony P. Giunta, P.G., Director, Waste Management Division
Gretchen R. Hamel Esq., Administrator, DES Legal Unit
William Holka, President, Omni Components Corporation

E-mail: JJD/SD/MM/PM

Enclosure: Inspection Modules